

**SADOWSKI KATZ LLP**

Robert W. Sadowski (*pro hac vice*)

Raphael Katz (*pro hac vice*)

rsadowski@sadowskikatz.com

rkatz@sadowskikatz.com

830 Third Ave, 5<sup>th</sup> Floor

New York, New York 10022

Telephone: (646) 503-5341

Fax: (646) 503-5348

**HAMMOND LAW PC**

Julian Hammond (SBN 268489)

1180 S. Beverly Drive, Suite 610

Los Angeles, CA 90035

Telephone: (310) 601-6766

Fax: (310) 295-2385

*Attorneys for Relator Angela Niazi*

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

**UNITED STATES OF AMERICA and  
the STATE OF CALIFORNIA, *EX*  
*REL.* ANGELA NIAZI,**

**Plaintiff/Relator,**

**v.**

**CVS PHARMACY, INC.,**

**Defendant.**

**Case No.: CV 15-5518 (ODW)(FFM)**

**RELATOR'S REQUEST FOR  
DISMISSAL OF ACTION;  
CONSENT OF UNITED STATES  
OF AMERICA AND STATE OF  
CALIFORNIA**

**[[PROPOSED] ORDER LODGED  
CONCURRENTLY HEREWITH]**

1 Pursuant to Fed. R. Civ. P. 41(a)(2) and subject to the terms of the  
2 Settlement Agreement between and among the parties, *qui tam* plaintiff Angela  
3 Niazi (“Relator”) hereby requests that the Court dismiss the above-captioned  
4 action (“this action”) with prejudice as to Relator and without prejudice as to the  
5 United States of America and the State of California. A proposed Order to  
6 Dismiss Action is lodged concurrently herewith.  
7

8  
9  
10 Dated: September 13, 2018

Respectfully submitted,  
SADOWSKI KATZ LLP

11  
12 /s/Robert W. Sadowski<sup>1</sup>  
13 ROBERT SADOWSKI  
14 Counsel for Angela Niazi  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27

28 <sup>1</sup> Pursuant to Local Rule 5-4.3.4(a)(2)(i), the filer attests that the other signatories listed, and on whose behalf this filing is submitted, concur in this filing’s content and have authorized this filing.

**CONSENT OF THE UNITED STATES OF AMERICA**

In the interests of justice, the Attorney General of the United States of America (“United States”), through the undersigned attorney, hereby consents to the dismissal of this action without prejudice as to the United States.

Dated: September 13, 2018

Respectfully submitted,

NICOLA T. HANNA  
United States Attorney  
DAVID M. HARRIS  
Assistant United States Attorney  
Chief, Civil Division

/s/ David K. Barrett  
DAVID K. BARRETT  
Assistant United States Attorney  
Chief, Civil Fraud Section  
Attorneys for the United States of America

**CONSENT OF THE STATE OF CALIFORNIA**

In the interests of justice, the Attorney General of the State of California (“California”), through the undersigned attorney, hereby consents to the dismissal of this action without prejudice as to California.

Dated: September 13, 2018

Respectfully submitted,

/s/ Adelina O. Berumen

ADELINA O. BERUMEN

Deputy Attorney General

California Department of Justice

Office of the Attorney General

Bureau of Medi-Cal Fraud & Elder Abuse

Attorney for the State of California

**SADOWSKI KATZ LLP**

Robert W. Sadowski (*pro hac vice*)

Raphael Katz (*pro hac vice*)

rsadowski@sadowskikatz.com

rkatz@sadowskikatz.com

830 Third Ave, 5<sup>th</sup> Floor

New York, New York 10022

Telephone: (646) 503-5341

Fax: (646) 503-5348

**HAMMOND LAW PC**

Julian Hammond (SBN 268489)

1180 S. Beverly Drive, Suite 610

Los Angeles, CA 90035

Telephone: (310) 601-6766

Fax: (310) 295-2385

*Attorneys for Relator Angela Niazi*

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA and  
the STATE OF CALIFORNIA, *EX*  
*REL.* ANGELA NIAZI,

Plaintiff/Relator,

v.

CVS PHARMACY, INC.,

Defendant.

Case No.: CV 15-5518 (ODW)(FFM)

**[PROPOSED]  
ORDER TO DISMISS ACTION**

1           *Qui tam* plaintiff Angela Niazi having requested, pursuant to Fed. R. Civ.  
2 P. 41(a)(2), that the above-captioned action (“this action”) be dismissed with  
3 prejudice as to Angela Niazi and without prejudice as to the United States of  
4 America and the State of California, and the United States of America and State  
5 of California having consented, in the interests of justice,  
6  
7

8           IT IS HEREBY ORDERED THAT this action is dismissed with  
9 prejudice as to Relator Angela Niazi and without prejudice as to the United  
10 States of America and the State of California.  
11

12  
13  
14 Dated: \_\_\_\_\_

15 \_\_\_\_\_  
16 UNITED STATES DISTRICT JUDGE  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28